

**IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF PENNSYLVANIA**

KIMBERLY PLETCHER, et al.	)	
	)	
Consolidated Plaintiffs	)	
	)	
v.	)	Case No. 2:20-cv-754 NBF
	)	
GIANT EAGLE, INC. and C&J Grocery CO.,	)	
LLC,	)	
	)	
Defendants.	)	

**MOTION FOR LEAVE TO AMEND AND ANSWER**

AND NOW, COME the parties by their undersigned counsel and file this Motion for Leave to Amend and Answer and in support thereof state the following:

1. Pursuant to this Honorable Court’s Order of October 23, 2020, Defendants are to file their Answers by November 6, 2020.

2. Plaintiffs intend to amend their complaint to include claims under the Pennsylvania Human Relations Act (“PHRA”) and Defendants have consented to the amendment and do not challenge that Plaintiffs have exhausted their administrative remedies with respect to the PHRA claims that have been filed with the Pennsylvania Human Relations Commission.<sup>1</sup>

3. Plaintiffs can file an amended complaint adding their PHRA claims by November 6, 2020, and Defendants can file an Answer by December 11, 2020.

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<sup>1</sup> The PHRC has indicated to Plaintiffs’ counsel that it will dismiss Plaintiffs’ PHRA claims.

4. The parties respectfully request that this Honorable Court issue an order permitting Plaintiffs to file an amended complaint by November 6, 2020 to be answered by Defendants by December 11, 2020.

WHEREFORE, the parties respectfully request that this Honorable Court grant this motion and issue an order consistent with the jointly proposed order attached hereto.

Respectfully submitted,

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